

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

KOHCHISE JACKSON,

Plaintiff,

v.

CORIZON HEALTH, INC., et al.,

Defendants

Case No.: 19-13382

U.S. DISTRICT COURT JUDGE
GERSHWIN A. DRAIN

DECLARATION OF SCOTT KING, ESQ.

I, SCOTT KING, SWEAR UNDER PENALTY OF PERJURY AS FOLLOWS:

1. My name is Scott King. I am an attorney and Chief Legal Counsel for CHS TX, Inc dba YesCare. I was formerly the Chief Legal Counsel for Corizon Health, Inc. from June 2011 until May 2022. I make this Declaration based on personal knowledge of the facts herein.

2. Isaac Lefkowitz is a Director of YesCare Holdings, a New York-based company that is a remote parent of CHS TX, Inc.

3. As of 2017, Blue Mountain Capital Management (“Blue Mountain”) was the largest beneficial owner of the predecessor to Corizon Health, Inc. (herein, “Corizon”). At the time, Mr. Lefkowitz had no role in Blue Mountain or any other beneficial owner of Corizon, or any entity related to Corizon.

4. In 2020, Blue Mountain sold the equity of Valitas Intermediate Holdings, Inc. (“VIH”) to Flacks Group, a Miami-based investment firm. VIH was the holding company over Corizon. At the time, Mr. Lefkowitz had no role with Flacks Group, Corizon, or any entity related to Corizon.

5. Corizon’s MDOC contract expired on May 31, 2021.

6. Mr. Lefkowitz did not become involved with Corizon until December 2021, when Flacks Group sold the business to Perigrove 1108, LLC.

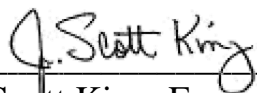
7. Mr. Lefkowitz holds no role with CHS TX, Inc. or the now-bankrupt entity Tehum Care Services, Inc. (fka Corizon Health, Inc.).

8. Mr. Lefkowitz resides in New York State and Israel.

9. Dr. Jeffrey Bomber was never an employee of CHS TX, Inc. or Corizon. At the time of Corizon’s contract with MDOC, Dr. Bomber was the owner of Quality Correctional Care of Michigan, P.C., a physician practice group that subcontracted with Corizon to provide physician services.

10. Mason Gill was never an employee of CHS TX, Inc. His employment with Corizon ended on October 22, 2021.

Dated: July 31, 2025



Scott King, Esq.

Sworn to and subscribed before me this the 31st day of July, 2025.





Notary Public

My Commission Expires:

3-24-2027